

United States Department of the Interior



OFFICE OF ENVIRONMENTAL PROJECT REVIEW DENVER FEDERAL CENTER, BUILDING 56, ROOM 1018
P.O. BOX 25007
DENVER, COLORADO 80225-0007

7026

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SUPERFUND ERANCH

Ms. Sandra R. Moreno Assistant Regional Counsel Environmental Protection Agency 999 18th Street, Suite 500 Denver, Colorado 80202 SF FILE NUMBER

Dear Ms. Moreno:

This is a follow-up to telephone conversations you and Ms. Barbara Schmalz of my office have had regarding the Richardson Flat site in Utah. We have contacted the Bureaus in the Department of the Interior (DOI) and asked them to identify any concerns/issues/interest they could foresee at this time. The Fish and Wildlife Service (FWS), the Bureau of Land Management (BLM), and the Bureau of Reclamation (BR) raised three basic lands/resource related concerns, as follows.

Lands/Resource Concerns

FWS has determined that this site contains wetlands of value as breeding and loafing habitat for waterfowl species for which FWS has trustee responsibilities. Environmental contaminants at the site constitute a detrimental impact on wetlands and waterfowl. In addition, clean-up activities designed without adequate consideration of wetland values can be equally detrimental to trustee resources.

Studies conducted and documents written pertaining to the Richardson Flat site should document the contaminants present in waterfowl habitats and serve to design clean-up actions that protect and restore wetland values at the site. If remedial actions at the site result in the loss of wetland habitat values, mitigation of the loss must be provided.

BLM has management responsibilities for several small parcels of land (1 to approximately 88 acres) that are two to five miles from Richardson Flat. One of these parcels has had tailings from Prospector Square activities deposited upon it, and is presently the subject of a Site Investigation (SI). Given that all the BLM managed parcels are both upgradient and apparently upwind of prevailing surface winds from Richardson Flat, BLM does not believe, at this time, that their lands have been affected by releases from Richardson Flat.

Lastly, BR is currently involved in a major construction project, Jordanelle Dam, elements of which are in close proximity to Richardson Flat.

Technical Assistance Available

The FWS office in Salt Lake City is willing to provide its expertise and technical assistance in determining the extent to which contaminants adversely affect fish and wildlife resources, and in designing appropriate clean-up actions. Should you wish to tap this resource experience, please contact Mr. Robert Ruesink, State Supervisor, at FTS 588-5630.

In addition, the BR, U.S. Geological Survey, and Bureau of Mines have an interagency agreement to provide technical assistance and management services to each other in support of each Bureau's respective activities related to environmental contamination, including assistance to other Federal agencies. They can provide technical review and oversight of contractor activities and documents. Should you desire assistance from one or all of these Bureaus, please contact Mr. Richard Lasson in the BR Salt Lake City office at FTS 588-5520.

We hope these comments are of assistance to you as your begin clean-up efforts at the Richardson Flat site. This office would like to be kept advised of the remedial investigation/feasibility study (RI/RS) activities at Richardson Flat such that a final determination can be made of possible impacts to DOI's concerns. In addition, activities at Richardson Flat may relate to SI activities at Silver Maple claims. Thus, we would like to see copies of the RI/FS and RD/RA documents once they are prepared. Please contact Barbara Schmalz or me at the time they are being prepared for review. If we can be of any assistance prior to that, we can be reached at 236-6900.

Sincerely,

Robert F. Stewart

Regional Environmental Officer

cc: Barry Levene, EPA
Gene Taylor, EPA